



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

DEC 27 2017

7015 0640 0001 0675 5791

CERTIFIED MAIL RETURN RECEIPT REQUESTED

James Fedena, Sr. Vice President
PBF Logistics Products Terminals LLC
1 Sylvan Way, 2nd Floor
Parsippany, NJ 07054

Re: Request for Information Pursuant to Section 114 of the Clean Air Act, Reference
Number: CAA-02-2018-1451

Dear Mr. Fedena:

The Clean Air Act, 42 U.S.C. §§ 7401 *et seq.* (CAA or the Act), at Section 114, 42 U.S.C. § 7414, authorizes the U.S. Environmental Protection Agency (EPA) to require submittal of information, among other things, to assess compliance with the Act and regulations promulgated pursuant to the Act. In accordance with Section 114(a) of the Act, this Request for Information (Information Request) requires PBF Logistics Products Terminals, LLC (PBF) to submit information with respect to the PBF Paulsboro Terminal (the Facility), located at 3rd Street & Billingsport Road, in Paulsboro, New Jersey.

On May 10, 2017, EPA's National Enforcement Investigations Center (NEIC) measured elevated benzene concentrations just outside of the fence line of the Facility using a differential ultraviolet absorption spectrometer (DUVAS) instrument that is part of EPA's Geospatial Measurement of Air Pollutants (GMAP) unit. After the initial data was quality assured, EPA determined that a benzene concentration of 31 parts per billion (ppb) was measured during a drive-by of the facility with the GMAP unit. A stationary reading on the side of the road for approximately 10 minutes yielded a maximum benzene concentration of 72 ppb.

Both of these readings were taken directly downwind of the Facility's Tank 13481 (Tank 81), which is located directly upwind of a residential neighborhood. NEIC personnel used an infrared FLIR camera (IR camera) to confirm that Tank 81 was venting hydrocarbon emissions, and was likely the source of the elevated benzene levels measured by the DUVAS.

In addition, EPA Region 2 performed an inspection of the Facility on August 23, 2017. During the inspection, it was discovered that Tank 81 was storing a petroleum product called light reformate, which contains approximately 15% benzene and is directly pipelined from the nearby Paulsboro Refining Company LLC petroleum refinery. EPA Region 2 again used the FLIR IR

camera to confirm hydrocarbons venting from Tank 81. EPA did not detect hydrocarbon emissions from other tanks at the Facility adjacent to Tank 81, which store petroleum products with similar vapor pressures to light reformate.

As a follow-up to the August 23, 2017 inspection, EPA Region 2 obtained additional information regarding Tank 81. Based on the information submitted by PBF, a new internal floating roof was installed at Tank 81 in October of 2016. According to the engineering drawings submitted by PBF, the deck on the internal floating roof has a thickness of 0.025 inches and the seams of each 60-inch-wide aluminum sheet are bolted to girders. It appears these bolts are spaced every 12 inches along the length of the girders. The approximate total length of bolted seams of the 0.025-inch-thick aluminum deck is 3,114 feet.

Based on the benzene emission measurements taken by the GMAP unit, the two instances of optical gas imaging of hydrocarbon emissions from Tank 81 observed by the FLIR camera, and the potential for emissions to seep through a large total length of the bolted 0.025-inch deck sheet, EPA is concerned that the internal floating roof installed just over one year ago is not minimizing or preventing emissions from Tank 81 to the maximum extent practicable.

Furthermore, both the drive-by and stationary benzene concentrations exceed EPA's Risk Screening Levels for air-borne benzene in residential areas, which warrants additional investigation and possible mitigation. Benzene has both carcinogenic (leukemia) and non-carcinogenic (neurological, hematological and immunologic) health effects. While these levels are above screening levels, warranting additional investigation, it should be noted that the measured concentration of benzene-in-air is well below EPA's most stringent Acute Exposure Level Guideline, which would indicate a need for emergency actions.

Pursuant to Section 114 of the Act, this Information Request requires PBF to submit all of the information described in Enclosure 1. Failure to submit the requested information is a violation of Section 114 of the Act, and may result in an order to comply, an order for administrative penalties, or a civil action for penalties and injunction requiring compliance pursuant to EPA's enforcement authority provided in Section 113(a) of the Act. See Enclosure 2. In accordance with Section 113(c)(2)(A) of the Act, any person who knowingly makes any false statement, representation, or certification, or who omits material information from or knowingly alters, conceals, or fails to file a response to this Information Request, may be subject to criminal action.

You may choose to assert a business confidentiality claim covering all or part of the information submitted. You may not, however, withhold any information on that basis. In order for EPA to consider a claim of business confidentiality for one or more of the documents submitted by you, a cover sheet, stamped or typed legend, or other suitable form of notice must be placed on or attached to the document, with language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. For each confidentiality claim, the date or occurrence of any event after which the information can be released should be indicated, if applicable. If no confidentiality claim accompanies the information received by EPA, all information submitted as part of your response may be made

available to the public without further notice to you. EPA will disclose information covered by a confidentiality claim only to the extent allowed by, and in accordance with, the procedures set forth in EPA's public information regulations, 40 C.F.R. §§ 2.201 et seq. (See 41 Fed. Reg. 36902 (Sept. 1, 1976)).

In order to comply fully with this Information Request, your response must include a completed Certification of Response (see Attachment to Enclosure 1), notarized by a notary public, and signed by you or another officer of your company. Your responses to the questions in Enclosure 1, including all supporting documents and the Certification of Response, must be submitted to EPA in accordance with the schedule set forth in Enclosure 1 to:

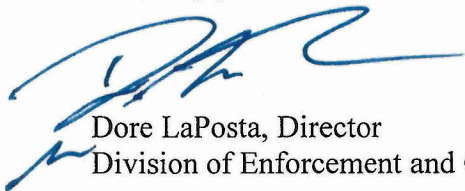
Robert Buettner, Chief
Air Compliance Branch
U.S. Environmental Protection Agency
Region 2 Office
290 Broadway, 21st Floor
New York, New York 10007-1866

You must respond to this Information Request within **thirty (30) days** of receipt. Any request for an extension of time to respond must be made in writing to Mr. Buettner at the address above, must include the reason(s) for the delay in responding, and must include the requested subsequent date for responding. In order to allow sufficient time for review, any such request for an extension of time must be made at least ten (10) calendar days prior to the date on which the requested information is due to EPA. An extension of time will be effective only if granted by EPA in writing.

Please include the above-cited Reference No. CAA-02-2018-1451 in any and all of your response(s) to this Information Request. Further, if within one year of the date of this Information Request, you obtain information different from, or in addition to, the information provided, or if there is any change affecting the information submitted, you must notify EPA and submit the relevant information no later than twenty (20) calendar days after such information becomes available.

You may address any questions concerning this matter to Hans Buenning in the EPA Air Compliance Branch at buenning.hans@epa.gov or at 212-637-6438. We appreciate and look forward to your prompt response.

Sincerely yours,



Dore LaPosta, Director
Division of Enforcement and Compliance Assistance

Enclosure

1918

1919

1920

1921

1922

1923

1924

1925

1926

1927

1928

1929

1930

1931

1932

1933

ENCLOSURE 1

**INFORMATION REQUEST LETTER PURSUANT TO SECTION 114 OF THE CLEAN
AIR ACT, REGARDING THE PBF LOGISTICS PRODUCTS TERMINALS, LLC
PAULSBORO TERMINAL LOCATED AT 3RD STREET & BILLINGSPOUR ROAD,
PAULSBORO, NEW JERSEY**

Pursuant to Section 114 of the Clean Air Act, PBF must supply the requested information below. The requested information must be submitted in accordance with these instructions and the schedules set forth in Part III, below, unless EPA grants, in writing, an extension of time to respond.

Part I: Instructions

In preparing your responses, please refer to the following instructions:

- A complete and separate response must be provided for each numbered information request paragraph and subparagraph below. Identify each response with the same paragraph or subparagraph number to which it corresponds.
- Provide all supporting documentation for each response. Supporting documentation includes, but is not limited to, company records (such as logs, receipts, ledgers, etc.), notifications or reports that have been submitted to EPA and/or the New Jersey State Department of Environmental Protection (referred to hereinafter as NJDEP), manufacturer's equipment specifications and equipment certifications, and other similar types of documents. For each document submitted, indicate the paragraph number to which it corresponds.
- Provide as precise and complete a response as possible, even if the information sought was never documented in writing or if the written documents are no longer available. Consult with all present and past employees and agents whom you or other employees or officers have reason to believe may be familiar with the matter to which the question pertains. Provide the name of each person responding to each information request paragraph, along with the names of all persons consulted in the preparation of each response.
- If the requested information or documentation cannot be made available, state the reason(s) why it cannot be made available, and provide all information that could lead to obtaining it. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be specific.
- In response to each question below, please provide, in detail, all relevant information. Provide this information, via a CD/DVD, in Microsoft Excel, Microsoft Word or optical character recognition (OCR) Adobe Acrobat PDF format. If the information

requested is not in existence or is not available, submit a statement certifying that such information is either not in existence or not available, along with an explanation supporting such certification.

Part II: Definitions

All terms used in this Information Request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401 et seq., and other CAA implementing regulations. Where reference is made to the EPA regulatory provisions only, however, you should also apply the applicable federally-approved state provisions when appropriate. Additional definitional clarification is specified below.

- A. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these.
- B. The term “Facility” shall mean the PBF Logistics Products Terminals, LLC, Paulsboro Terminal, located at 3rd Street & Billingsport Road, Paulsboro, New Jersey 08066.
- C. The term “Tank 81” shall mean the aboveground storage tank identified by PBF as Tank 13481 and as equipment ID E17 in the Title V Operating Permit issued to PBF by the NJDEP.
- D. The terms “you”, “your” or “PBF” means the following: the addressee of this Information Request; PBF Logistics Products Terminals, LLC.

Part III: Specific Information Requests

Information Request

Provide the following information regarding the Facility within **thirty (30) days** from the receipt of this Information Request. Unless otherwise stated, this information must be submitted in Microsoft Excel, Microsoft Word, or optical character recognition (OCR) Adobe Acrobat PDF format depending on the information requested.

1. Within thirty (30) days of receipt of this Information Request, PBF must submit a test plan, for EPA review and approval, to conduct an engineering investigation into the integrity and adequacy of the design and installation of the internal floating roof for Tank 81 installed in October 2016. This plan must include, but is not limited to:

- a) Placing a Lower Explosive Limit (LEL) meter with data logging capability on the top of the internal floating roof.

- i) The LEL meter shall be calibrated with methane prior to use, and the date and time shall be set to local time;

- ii) LEL measurements shall be conducted when the wind is less than 1 mile per hour; and,

- iii) Data logging of the LEL measurements shall be in 15-second intervals and measurements shall be done for 30 minutes.

- b) Use a SUMMA canister to sample the tank headspace gas for TO-15 and Speciated Non-Methane Organic Compounds analysis.

- i) Sampling shall occur at the same time as the LEL measurements.

- ii) A Teflon sampling tube shall be attached to the SUMMA canister of sufficient length to obtain a sample below the level of the perimeter vents.

- c) The SUMMA canister data shall be used to correct the LEL measurements by using published response factors for the compounds and a volume-weighted calculation, as follows:

$$LEL = (P1 + P2 + \dots Pn) / (P1/LEL1 + P2/LEL2 + \dots Pn/LELn)$$

P1 = volume fraction of first component; LEL1 = lower explosive limit of component 1

- d) During sampling: (1) the internal floating roof shall not be in motion; (2) the tank shall contain light reformate (product code PB15-381-00); and the product temperature shall be recorded.

- e) Use an optical gas imaging camera to record a video in both automatic and high sensitivity modes of the internal floating roof, to include the rim seal, deck fittings, vacuum breaker vents, and other potential sources of emissions. Record the video when

the internal floating roof is in a position of maximum visibility from the hatch, and record each potential source of emissions for approximately 5 seconds.

- f) The test report shall include the original LEL data log, the SUMMA sample results, the gas mixture percent of LEL, and the optical gas imaging video.
2. PBF must conduct the testing in accordance with the EPA-approved test plan within thirty (30) days of receiving such approval, and must provide EPA with at least ten (10) days advanced notice of the commencement of the testing. If wind conditions are not suitable on the planned test date, PBF shall confer with EPA on a test date based on the outlook weather forecast. PBF must submit the test report documenting the results of the testing, including all supporting data, measurements and other required analysis and documentation, within thirty (30) days of completing the testing.
 3. Provide verification, with all supporting documentation, that the internal floating roof for Tank 81, installed in October 2016, meets each of the following requirements of 40 C.F.R. Part 60, Subpart Kb, "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984," at section 60.112b(a)(1):
 - a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled;
 - b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (i) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank;
 - (ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or
 - (iii) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by

braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof;

- c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface;
 - d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;
 - e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;
 - f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting;
 - g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening;
 - h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover; and
 - i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
4. Provide verification, with all supporting documentation, that the internal floating roof for Tank 81 installed in October 2016, meets each of the following requirements of New Jersey Administrative Code, Title 7, Chapter 27, Subchapter 16.2, Control and Prohibition of Air Pollution by Volatile Organic Compounds – VOC stationary storage tanks (N.J.A.C. 7:27-16.2).
- a) Each fixed roof support column and well with a sliding cover shall be gasketed or equipped with flexible fabric sleeve;

- b) Each ladder well shall be equipped with a gasketed cover. That cover shall be closed at all times, with no visible gaps, except when the well must be opened for access;
- c) Each access hatch shall be equipped with a cover that is gasketed and bolted. Equip each gauge float well with a cover that is either gasketed and weighted or gasketed and bolted;
- d) Each gauge hatch/sample well shall be equipped with a cover that is gasketed;
- e) Gasket or cover each adjustable roof leg with a VOC impervious sock at all times when the roof is floating;
- f) Gasket each rim vent. Rim vents shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting;
- g) Each vacuum breaker is gasketed. Vacuum breakers shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off or is being landed on the roof leg supports;
- h) Each open floating roof drain shall be equipped with a slotted membrane fabric cover or other device with an equivalent control efficiency that covers at least 90 percent of the area of the opening;
- i) Each unslotted guidepole well shall be equipped with a gasketed sliding cover and a flexible fabric sleeve or wiper;
- j) Each slotted guidepole shall be equipped with a gasketed cover, a pole wiper and a pole sleeve. The pole sleeve shall be extended into the stored liquid;
- k) Each slotted guidepole having a pole float shall be equipped with a gasketed cover, a pole wiper, and a pole float wiper. The wiper or seal of the pole float shall be at or above the height of the pole wiper;
- l) Each slotted guidepole opening shall be equipped with a gasketed cover at all times, with no visible gaps, except when the cover must be opened for access;
- m) Except for vacuum breakers, rim vents, roof drains, and leg sleeves, equip all other openings in the roof with a gasketed cover or seal that is closed at all times, with no visible gaps, except when the cover or seal must be opened for access;
- n) The rim seal system of the tank shall consist of either:

- (i) A liquid-mounted primary seal meeting the requirements for primary seals at N.J.A.C. 7:27-16.2 (l)(3)(iii), (vii), and (x), and having no tears or openings, or;
- (ii) A primary and secondary seal meeting the requirements of N.J.A.C. 7:27-16.2 (l)(3)(i)-(x), except that:
 - (A) A mechanical shoe primary seal shall have one end extend a minimum vertical distance of 15 centimeters (six inches) above the stored organic liquid surface and the other end extend into the liquid a minimum of 10 centimeters (four inches) instead of meeting the requirement at N.J.A.C. 7:27-16.2 (l)(3)(v); and
 - (B) A vapor-mounted wiper primary seal may be used on a tank with a shell that has riveted or lap-welded horizontal seams instead of the liquid mounted or mechanical shoe primary seal required at N.J.A.C. 7:27-16.2 (l)(3)(i).
- o) For an internal floating roof installed after July 23, 1984, ensure that the concentration of organic vapor in the vapor space above the internal floating roof shall not exceed 30 percent of its lower explosive limit.
- 5. Provide all documentation regarding PBF's standard operating procedure (SOP) for Tank 81, including all SOPs related to the current internal floating roof system installed at Tank 81, covering the period from October 2016 through the present.
- 6. Provide all documentation regarding PBF's maintenance procedures, protocols, and schedules, including all records of maintenance or repairs performed on Tank 81 and/or the internal floating roof at Tank 81, covering the period from October 2016 through the present.

ATTACHMENT TO ENCLOSURE 1
CERTIFICATION OF RESPONSE

State of _____:

County of _____:

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to the Information Request Letter and all documents submitted with this response, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted with this response are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that for one year from the date of the Information Request Letter, I am under an obligation to supplement my response to the Information Request Letter if any additional information relevant to the matters should become known or available to me.

NAME (print or type)

TITLE (print or type)

SIGNATURE

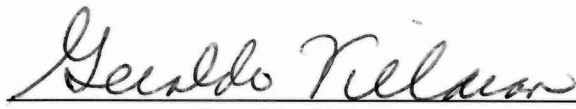
Sworn to before me this ____ day of _____, 2018

Notary Public

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON December 28, 2017, I MAILED A TRUE COPY OF THE ATTACHED DOCUMENT BY CERTIFIED MAIL-RETURN RECEIPT REQUESTED, ARTICLE NUMBERS 7015-0640-0001-0675-5791 POSTAGE PRE-PAID, UPON THE FOLLOWING PERSON(S):

**James Fedena, Sr. Vice-President
PBF Logistics Products Terminals LLC
1 Sylvan Way, 2nd Floor
Parsippany, New Jersey 07054**


Geraldo Villaran

Handwritten text, possibly a signature or date, located near the top center of the page.

Handwritten text, possibly a signature or date, located in the middle section of the page.

Handwritten text, possibly a signature or date, located in the lower middle section of the page.

Handwritten text, possibly a signature or date, located near the bottom center of the page.